

**From:** [Patricia P. Shields](#)  
**To:** [Ashish Mahendru](#); [Joshua D. Neighbors](#)  
**Cc:** ["Danielle Butler"](#); ["Darren Braun"](#)  
**Subject:** RE: Prime v. Ragsdale  
**Date:** Wednesday, June 26, 2019 10:00:46 AM

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Ashish,

Please sent us your proposed Amended Complaint, and we'll discuss your request with our client.

Tricia

**Patricia P. Shields** | Partner  
Hedrick Gardner Kincheloe & Garofalo LLP.  
4131 Parklake Ave., Suite 300 | Raleigh, NC 27612  
Phone: 919-719-3729 | Fax: 919-832-9425  
PShields@hedrickgardner.com | [www.hedrickgardner.com](http://www.hedrickgardner.com)



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**From:** Ashish Mahendru <amahendru@thelitigationgroup.com>  
**Sent:** Wednesday, June 26, 2019 10:32 AM  
**To:** Joshua D. Neighbors <JNeighbors@hedrickgardner.com>  
**Cc:** Patricia P. Shields <PShields@hedrickgardner.com>; 'Danielle Butler' <dbutler@thelitigationgroup.com>; 'Darren Braun' <dbraun@thelitigationgroup.com>  
**Subject:** RE: Prime v. Ragsdale

Josh,

First, thank you for the extension. We are still actively seeking local counsel and have not landed on anyone's doorstep just yet.

Second, I wanted to alert you that we have a settlement as of June 24th in the underlying case. A mediation was conducted in Houston, and the parties were able to reach an agreement.

In light of that, we would like to amend our complaint and address the settlement numbers in the complaint. Further, I had alerted Judge Lake in our initial conference in Houston that I would be amending the complaint, which is why he set the deadline out to August 2nd.

Do you have any opposition to our filing an amended complaint?

**Ashish Mahendru**  
**Mahendru, PC**  
**639 Heights Blvd.**  
**Houston, Texas 77007**  
**713-571-1519 (o)**  
**713-651-0776 (f)**  
**[www.thelitigationgroup.com](http://www.thelitigationgroup.com)**

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**From:** Joshua D. Neighbors [<mailto:JNeighbors@hedrickgardner.com>]  
**Sent:** Friday, June 21, 2019 9:08 AM  
**To:** Ashish Mahendru  
**Cc:** Patricia P. Shields  
**Subject:** RE: Prime v. Ragsdale

Ashish,

Thank you for your email. My understanding is that you have 21 days to respond to our motion to dismiss. We will consent to an extension of an additional 21 days.

Thank you.

**Joshua D. Neighbors** | Associate  
Hedrick Gardner Kincheloe & Garofalo, LLP.  
4131 Parklake Ave., Suite 300 | Raleigh, NC 27612  
Phone: 919-719-3719 | Fax: 919-832-9425  
[JNeighbors@hedrickgardner.com](mailto:JNeighbors@hedrickgardner.com) | [www.hedrickgardner.com](http://www.hedrickgardner.com)

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**From:** Ashish Mahendru <[amahendru@thelitigationgroup.com](mailto:amahendru@thelitigationgroup.com)>  
**Sent:** Thursday, June 20, 2019 6:40 PM  
**To:** Joshua D. Neighbors <[JNeighbors@hedrickgardner.com](mailto:JNeighbors@hedrickgardner.com)>  
**Cc:** 'Danielle Butler' <[dbutler@thelitigationgroup.com](mailto:dbutler@thelitigationgroup.com)>; 'Darren Braun' <[dbraun@thelitigationgroup.com](mailto:dbraun@thelitigationgroup.com)>  
**Subject:** Prime v. Ragsdale

Josh,

I am out of the office this entire week but I saw your notice of appearance earlier today, and I just saw your motion to dismiss.

We are in the process of retaining local counsel to assist us with our pro hac vice applications. Could you give us some time to get properly situated before the Court before we have to start responding to papers?

**Ashish Mahendru**  
**Mahendru, PC**  
**639 Heights Blvd.**  
**Houston, Texas 77007**  
**713-571-1519 (o)**  
**713-651-0776 (f)**  
[www.thelitigationgroup.com](http://www.thelitigationgroup.com)

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From: [amahendru@thelitigationgroup.com](mailto:amahendru@thelitigationgroup.com)

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